

**MEMO ENDORSED**

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 DOCUMENT  
 ELECTRONICALLY FILED  
 DOC #: One Dag Hammarskjöld  
 DATE FILED: 12/28/2023  
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December 27, 2023

By ECF

Hon. Valerie E. Caproni, U.S.D.J.  
 United States District Court  
 for the Southern District of New York  
 Thurgood Marshall Courthouse  
 40 Foley Square, Courtroom 443  
 New York, New York 10007

Re: *Studio Nazar Inc. v. Reliable Knitting Works, Inc. d/b/a Reliable of Milwaukee et al.*,  
S.D.N.Y. Case No. 1:23-cv-09467-VEC

Dear Judge Caproni:

We represent the Plaintiff Studio Nazar Inc. in the above-referenced copyright infringement action. The Notice of Initial Pre-Trial Conference (ECF Doc. 8) provides that the Initial Pre-Trial Conference (“IPTC”) is presently scheduled for January 5, 2024 at 10:00 a.m. We write to request a 21-day adjournment of the conference date and joint letter submission date set forth in the Notice of IPTC. This is the first such request for an adjournment.

As set forth in the Complaint, Plaintiff is the owner and registrant of copyrighted designs used in connection with its apparel business. Plaintiff commenced this action against Defendants Reliable Knitting Works, Inc. d/b/a Reliable of Milwaukee (“Reliable Knitting”) and Doe(s) 1-20 for the unauthorized use and infringement of Plaintiff’s copyrighted designs on apparel sold by Defendants.

On November 6, 2023, Plaintiff served the Summons and Complaint, together with Notice of IPTC, upon Reliable Knitting’s registered agent for service of process. *See* ECF Doc. 10 (Affidavit of Service).

On November 8, 2023, we were contacted by Mark Blutstein, an individual who described himself as the owner of the corporate defendant Reliable Knitting. Mr. Blutstein was in communication with my colleague, Peter Raymond, regarding settlement of the case.

On December 21, 2023, we received an email from Benjamin Imhoff, Esq., who advised that his firm had been retained to represent Reliable Knitting in this matter. Mr. Imhoff advised that Reliable Knitting will ask the Court for an extension of time to allow for the preparation of an answer and further settlement discussions, and requested plaintiff’s consent, which we gave.

Now, with counsel’s agreement, Plaintiff seeks a 21-day adjournment of: (i) the date for the IPTC, from January 5 to **January 26, 2024** and (ii) the date for the parties’ submission of a Joint Letter and proposed Case Management Plan, from December 28 to **January 19, 2024**. The

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additional time will provide Reliable Knitting the opportunity to appear and participate through counsel in these matters and further the parties' efforts to date to resolve this case.

We thank the Court for its attention to this matter.

Respectfully submitted,

WACHTEL MISSRY LLP

By: /s/Stella L. Sainty  
Stella L. Sainty

cc: Peter Raymond (by e-mail)  
Benjamin Imhoff, Esq. (by e-mail)

Application GRANTED. The Initial Pre-Trial Conference scheduled for Friday, January 5, 2024, at 10:00 A.M. is hereby ADJOURNED until **Friday, January 26, 2024, at 10:00 A.M.** The parties' joint letter and proposed case management plan as set forth at Dkt. 8 are due not later than **Thursday, January 18, 2024**. Not later than **Friday, January 5, 2024**, counsel for Defendant Reliable Knitting Works, Inc. must file a notice of appearance and its anticipated request for an extension to answer or otherwise respond to the Complaint. Going forward, and as set forth in the Undersigned's individual rules, the parties must file any adjournment request at least **48 hours** in advance of the deadline. **Failure to do so may result in sanctions.**

SO ORDERED.

 12/28/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE